1 WEST WILSON STREET

MADISON WI 53701-2659

P O BOX 2659

608-266-1251

FAX: 608-267-2832

TTY: 888-701-1253

dhs.wisconsin.gov



Jim Dovle Governor

Karen E. Timberlake Secretary

July 14, 2009

Scott Hansen **EPA Remedial Project Manager** 77 W. Jackson Blvd. (SR-6J) Chicago, IL 60604

Dear Mr. Hansen,

EPA Region 5 Records Ctr.

I am writing to you on behalf of the Wisconsin Department of Health Services (DHS), and greatly appreciate the opportunity to comment on the proposed plan for remediation of the Ashland/Northern States Power Superfund Site, in Ashland, Wisconsin.

As you know, DHS continues to be activity involved with this site and works closely with federal, state, and local agencies to address the human health implications of the contaminated sediments, surface water, groundwater, and sub-surface soils. Since 1995, DHS has concluded that contaminated sediments and tar slicks on surface water at the site are a human health hazard, that actions are needed to prevent unsafe exposures to the public, and a cleanup is needed. It is evident that the cleanup described in the proposed plan is a reasonable and carefully thought out approach to address the known and potential human health risks posed by the site. DHS supports this proposed plan.

While the proposed plan will ultimately protect human health, one specific issue not mentioned in the plan is the potential for unacceptable airborne releases during the cleanup of this former manufactured gas plant (MGP). As expressed by DHS with the public and agencies, a comprehensive air management plan is critical during the cleanup of MGP sites. We recommend that the final remedial action plan include a clear requirement for a comprehensive air management plan. DHS has significant experience with this issue at other MGP sites undergoing remediation. We can provide assistance to U.S. EPA to ensure that public health is protected during the cleanup and that remedial actions will operate as smoothly as possible.

We look forward to continuing our strong partnership with U.S. EPA in responding to environmental health concerns and protecting Wisconsin citizens.

Sincerely,

Bureau of Environmental and Occupational Health